



A NiSource Company

## MERCURY CONTAINING REGULATOR REMOVAL PROCEDURE

*Safety & Industrial Hygiene Department*

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Effective: 11/92

Revised: 10/00

This procedure includes various health and safety practices that shall be used during the removal of mercury containing regulator and accompanying meter sets from both inside and outside structures. The removal of mercury regulators and accompanying meters that may contain mercury shall be a two-person job. Individuals performing this work shall have received operational training for this removal, hazard communication training for mercury, and have access to a Material Safety Data Sheet for mercury.

For each mercury containing regulator and accompanying meter set to be removed, the employees shall be equipped with the following specialized materials. These materials are in addition to the standard tools and materials used in regulator/meter set removal operations.

	Item / Supplier	Qty.	Order #	Telephone
1)	Mercury Cleanup System, Laboratory Safety Supply Co.	1	OA-20876	800-356-0783
2)	Lab Pack Drum, Laboratory Safety Supply Co.	1	OA-31402	800-356-0783
3)	Container (30 gallon +) with lid, Local Hardware Store	1	N/A	
4)	10 mil Polyethylene Bag (Drum Liner) Laboratory Safety Supply Co.	1	OF-18090	800-356-0783
5)	Poly Sheeting, Laboratory Safety Supply Co.		OA-5505	800-356-0783
6)	Hg Absorb Powder, Laboratory Safety Supply Co.	2	OA-20756	800-356-0783
7)	Protective Gloves, OK Safety Products	1	14-LA258EB11	800-234-0536
8)	Protective Goggles, OK Safety Products	1	11-10097	800-234-0536
9)	Material Safety Data Sheet (MSDS) Label , NIPSCO	3	Stores Item No.114890	
10)	Pipe Caps and Plugs Local Industrial Supplier	8 (4 ea.)	N/A	

US EPA RECORDS CENTER REGION 5



460237

Employees shall wear protective gloves (Supply Item #7) and safety goggles (Supply Item #8) at all times while working with mercury, handling the regulator, meter and any



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fittings. The regulator and meter shall always be carefully handled to prevent any mercury spillage.

## REMOVAL

**NOTE: If any mercury is spilled during the regulator/meter removal process, the Mercury Cleanup System (Supply Item #1) shall be used IMMEDIATELY according to instructions. IMMEDIATELY NOTIFY YOUR SUPERVISOR OF THE SPILL.**

- 1) Hg Absorb Powder (Supply Item #6) shall be poured evenly over the bottom of the container (Supply Item #3) for meter removal to a depth 1/2-1". Affix the NIPSCO MSDS label (Supply Item #9) on the lab pack drum (Supply Item #2) and meter removal container (Supply Item #3). Place Poly Sheeting (Supply Item #5), of sufficient size to catch any materials that might fall during the removal process, under the entire regulator/meter set. Place the container (Supply Item #3) under the meter.
- 2) Shut off gas supply at the service wing cock and disconnect the vent pipe. Be careful to check for mercury inside the vent pipe. Place the vent pipe and any fittings inside the drum (Supply Item #2). If required, cut the vent pipe into sections small enough to fit inside the drum (Supply Item #2).
- 3) Carefully remove the meter, place the meter in the container (Supply Item #3), cap the inlet and outlet of the removed meter with plastic caps (Supply Item #10) and tag the meter with a completed "remove meter tag." This tag shall note that the meter is to be held for potential mercury contamination.
- 4) Hg Absorb Powder (Supply Item #6) shall be poured evenly over the bottom of the lab pack drum (Supply Item #2) to a depth 1/2-1".
- 5) Position the bag (Supply Item #4) around the regulator to catch any materials that might fall during the work. Also, if possible place the bag in the drum (Supply Item #2) and position both under the regulator. When the drum can't be positioned below the regulator, position it as close as practical.
- 6) While the first employee holds the bag in place, the second employee uses the four-wheel cutter to remove the regulator. Place the four-wheel cutter 4-6" above the regulator and cut through the pipe while the first employee holds the bag in place and steadies the regulator and pipe being cut.

*Is this better  
than something  
like vermiculite?  
That's what the  
other Ill Co. were  
going to use*

*placing a  
drum is difficult*

*No wonder there  
were spills*



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- Can't capping occur after each cut?*
- 7) Next, while the first employee continues to steady the regulator, the second employee will position the four-wheel cutter 4-6" below the regulator and cut through the pipe. As the regulator becomes free, the first employee will carefully lower the regulator into the bag (Supply Item #4). Cap the inlet and outlet of the removed regulator with plastic caps (Supply Item #10). When finished, seal (close) the bag and leave in it the drum or put it in the drum (Supply Item #2).
  - 8) Care SHALL be taken when removing any other fittings, as they may contain small amounts of mercury. These removed fittings shall be placed in the drum (Supply Item #2).
  - 9) After the regulator has been removed, sealed in the bag and placed in the drum (Supply Item #2), the lid shall be firmly in place before moving the drum.
  - 10) After the regulator and meter have been removed, protective gloves and goggles and used Poly Sheeting shall be placed in the meter container (Supply Item #3). The lids shall be firmly in place before moving the regulator drum and meter container off the property.
- Quality Control w/ MVA*

Upon returning to the LOA facility, follow the procedures as specified by the Environmental Affairs Department for storage and/or disposition of these materials.

If there are any questions regarding this procedure or any related issues, contact your supervisor IMMEDIATELY for resolution.

### Processing Mercury Regulator Identified Meter Sets

This section covers the administrative process to be followed when a meter is scrapped at the LOA. THIS IS A PAPER PROCESS ONLY. THE METER IS NOT PHYSICALLY TRANSFERRED FROM THE LOA.

- 1) The Serviceman completes a 911 form to return the meter to Stores.
  - a) The Serviceman shall write on the 911 form, "NO SALVAGE-MERCURY REGULATOR METER SET."
- 2) Stores will transfer the meter to GM&T on a separate MR for stores transfer.
  - a) The reason for transfer is to read, "NO SALVAGE-MERCURY REGULATOR METER SET."
  - b) The Company meter number and manufacturer's serial number are to be included on the MR for stores transfer.
- 3) GM&T will receive the meter (on paper only) into USED STOCK.



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- 4) GM&T will condemn the meter in Gas Meter Management and remove it from MAPPS.

NOTE: PHYSICAL DISPOSAL OF THE METER AND REGULATOR IS THE RESPONSIBILITY OF THE LOA, as specified and arranged for by the Environmental Affairs Department.

Nicor Gas

NICOR REG. REMOVAL  
PROCEDURES

Effective: January 1, 2000

Safety Program: Section 40

Supersedes: August 1, 1996

Subject: Mercury

Reference:

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- C. General Requirements
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**A. Scope**

Since mercury is a regulated substance, the following procedures are necessary when handling and removing mercury from our operating areas. The purpose of this program is to prevent employee exposure and environmental contamination during mercury handling.

**B. Definitions**

Containers - Mercury will be placed *only* in containers that have been approved and are supplied by the company. The types of containers are defined below.

Mercury collection container - The approved, air-tight 1 1/2 inch pipe nipple assembly with cap and base, which is kept in vehicles, and is used exclusively to collect mercury from equipment.

Clean mercury storage container - A properly labeled flask and overpack located in each reporting center, where all clean mercury is to be placed from your collection container.

Contaminated mercury storage container - A properly labeled five gallon container located in each reporting center, where mercury contaminated items including soil, regulators, etc. are to be placed.

Environmental Services - The Environmental department that is responsible for overseeing compliance with spill handling and waste disposal issues. They may be contacted at x 2442, x 2654, x 3359.

Hazardous waste - This refers to anything that contains a substance considered hazardous by the EPA, and appears on its Hazardous Substance List. A regulator with mercury in it as well as all mercury, whether clean or contaminated, is considered hazardous waste.

**Mercury (Hg)** - A naturally occurring metal found in the earth's core. Mercury is the only metal that is liquid in its natural state.

**Clean** - Mercury that does not contain any contaminants. Mercury found in regulator cups is considered clean and will be reclaimed.

**Contaminated** - Mercury containing another substance such as soil. Contaminated mercury must be placed in a plastic disposal bag and labeled "mercury contaminated waste" and disposed of as hazardous waste.

**SET Environmental** - Nicor Gas current waste disposal contractor. (847) 537 - 9221

**Scrap** - A mercury regulator or other equipment that has had all the mercury removed is considered scrap only when no mercury is visible or suspected in the body of the equipment.

**Spill kit** - A collection of materials necessary to correctly collect spilled mercury.

**Spill pan** - A seamless pan or bucket that is placed under all mercury handling procedures.

### **C. General Requirements**

All employees must comply with the following requirements when handling mercury:

1. If you have the potential to handle equipment that contains mercury, ensure that there is an approved Nicor Gas collection container and spill pan on your vehicle at all times.
2. Always place the spill pan under the collection container when pouring mercury into the collection container, and be prepared for spillage at all times.
3. Ensure that all mercury collection containers are properly identified as follows with the standard Nicor Gas mercury label.
  - a. Yellow and black mercury identification warning label
  - b. Directions to call the local Nicor Gas office if the container is found
  - c. Labeling protected by waterproof clear tape that completely surrounds and seals the label
4. Safety glasses with side shields or wrap-around style safety glasses are the minimum eye protection required when handling mercury or mercury-containing equipment.
5. Each reporting facility will designate a location to place mercury storage containers, which are provided and serviced by SET Environmental.
6. Each location will be equipped with the following:
  - a. Clean mercury storage containers (SET)

- b. Contaminated mercury storage containers
- c. Scrap dumpster for all clean equipment
- 7. Empty mercury collection containers when they become half full. It is recommended you empty it whenever you are in a reporting location.
- 8. Do not transport or store mercury in the passenger compartment of any vehicle. Mercury containers must be secured inside a truck tool bin, or in the rear of the cargo area of a van.
- 9. The EPA reportable amount of spilled mercury is one pound. Any spill of this amount must be reported to Environmental Services and the EPA. One pound is equal to one fluid ounce or 1/8 cup (standard measure) of mercury, which is the contents of four mercury regulator cups.
- 10. All vehicles being sold will be closely examined for residual mercury and will be properly cleaned of that mercury *before* leaving the facility.

#### **D. Mercury Manometers**

- 1. Disposal
  - a. When removing manometers from service, remove a cap from one end of the tube and pour the mercury into your collection container.
  - b. Check both caps for residual mercury.
  - c. Place all mercury from the tube and caps into the collection container.
  - d. After all the visible mercury is removed from the instrument, replace the caps and discard the tube in the scrap dumpster at your facility.
- 2. Transportation
  - a. All manometers must be transported in their carrying case or other suitable container.
  - b. Manometers will be transported in the tool bin of a truck, rear of a van or car trunk, but will *never* be transported in any passenger compartment.

#### **E. Mercury Regulators**

All regulator removal situations are different. Your main objective is to remove the mercury without exposing any person or the environment. If you are cutting the regulator out, do *not* use a hacksaw. Use a four-wheel cutter. No regulators will be cut out before the mercury is removed. You are required to follow all written procedures to accomplish removals safely.

1. Relieve all line pack pressure before removing the regulator. This is done by shutting the service valve off, and cracking any union that is downstream of the regulator. Failure to do so will cause the mercury to splatter when the cup is removed.
2. Keep the regulator upright at all times during removal. Mishandling can cause the mercury to flow into the body of the regulator, which means the regulator must be discarded as hazardous waste.
3. Before removing the cup, tap the regulator several times with a wrench to dislodge any mercury beads that may be in the body of the regulator. This will force them down into the cup.
4. Mercury cups are to be emptied outside of customer buildings whenever possible. When you are unable to keep the regulator upright during removal, the mercury cup will be removed from the regulator before the regulator itself is removed.
5. Before opening your collection container, tap the top several times in the event any beads are clinging to the top or around the top of the pipe nipple. Place the container into or over the spill pan when opening.
6. Hold the spill pan under the bottom of the regulator when removing the cup.
7. Carefully loosen and remove the mercury cup from the regulator, being careful not to spill the mercury. Some mercury may come out as you loosen the cup.
8. While holding the collection container over the spill pan, pour all the mercury from the cup into the collection container. Be sure to pour all visible mercury out.
9. Close the collection container tightly after you are done.
10. Put the cup back onto the regulator and place the regulator into the back of your truck. It is a good idea to place the regulator in a bucket to carry it out of a house.
11. Regulators can be discarded in the scrap dumpster *only* when there is no visible mercury in or on the regulator. Regulators will *not* be discarded when mercury is visible or is suspected to be in the regulator body. These must be disposed of as hazardous waste in the contaminated materials storage container in the storeroom.
12. All mercury regulators that were over pressured and vented their seal, will be disposed of as hazardous waste in the SET container marked "mercury contaminated debris". Do *not* place these regulators into the scrap regulator dumpster.
13. Write the address or work order number/function number of each mercury regulator on the body of the regulator with permanent marker.
14. When removing any mercury cup, be prepared for spillage, as some regulators may have been overfilled in the past.



**F. Spill Response**

1. Mercury spill kits are available to all employees who handle mercury. The minimum requirement is for one kit per reporting facility whose employees handle mercury, though locations may opt to place kits on each supervisor's vehicle, or place a smaller kit on all affected vehicles.
2. Mercury spilled in any part of your vehicle must be cleaned immediately, using the spill kit and these procedures.
3. In the event of a spill:
  - a. You must report all spills to your supervisor immediately. The supervisor will immediately notify Environmental Services at x 2442, x 2654, x 3359. Identify the source of the spill and estimate the amount spilled when you call. Your supervisor will bring you a spill kit if you do not have one.
  - b. Keep people and pets away and immediately clean all mercury spills using the approved mercury spill clean-up kit according to company procedures, and wear the personal protective equipment provided.
  - c. When mercury is spilled outdoors, you must thoroughly clean the area to ensure all mercury is completely removed. If in soil, scoop up the affected soil and place it in a large self-closing plastic bag, mark it "Mercury Contaminated Debris" and return it to the contaminated mercury container at your location. If the bag is not big enough, you may use any seamless container that can be cleaned, i.e. spill pan or plastic pail.
4. The mercury spill kit carried on operations and maintenance vehicles contains the following items. If any items are missing or are used, replace them immediately.

a. Mercury (Hg) absorb powder	e. Safety glasses
b. Mercury sponges	f. Gloves
c. Biohazard scoop and scraper	g. Disposal bag
d. Spill pan	

These kits may be in a 3 1/2-gallon seamless plastic pail with a screw top.

The mercury clean-up system carried by supervisors and in some offices contains the following:

- |                                |                      |
|--------------------------------|----------------------|
| a. Mercury (Hg) absorb powder  | e. Mercury indicator |
| b. Mercury sponge jars         | f. Safety glasses    |
| c. Biohazard scoop and scraper | g. Disposal bags     |
| d. Mercury vapor absorbent     | h. Gloves            |

Some older kits may also have a hand pump included.

## **G. Clean-Up Procedure**

When mercury falls onto a hard surface it breaks into small droplets and can spread over a large area. It is important that you look carefully for all droplets. Refer to the clean-up instructions included in the spill kit.

1. Keep people and pets away from the spill to avoid spreading the mercury.
2. Notify your supervisor immediately of the spill. If you do not have a spill kit on your vehicle, they will bring one to you.
3. Put on all personal protective equipment supplied in the spill kit.
4. Scrape the mercury spill together with the scraper and into the scoop. Place it into the collection container. Using the hand pump, suction as much clean mercury as you can and pour it into your collection container.
5. Scrape the remaining mercury into a puddle and pour Hg absorb powder in a circle around the puddle(s) and then over the top of the puddle(s).
6. Activate the Hg absorb by pouring a small amount of water from the wash bottle onto the powder.
7. Allow the powder to sit for a few minutes until it absorbs the mercury and gets somewhat solid.
8. Scrape the material into the scoop and place it into the sealable bag in the spill kit.
9. *Slightly* dampen a sponge (too much water will decrease the effectiveness of the sponge), and wipe the contaminated area with it slowly, allowing the rest of the mercury to absorb into the sponge.
10. When the mercury is absorbed, place the sponge into the sealable bag and dispose of as hazardous waste in the contaminated mercury container at your location. Repeat steps 8 and 9 until no mercury beads are visible.
11. Sprinkle Mercury Vapor Absorbent on the entire area of the spill and allow it to set.
12. Scrape all absorbent into the scoop and pour it into the plastic disposal bag.
13. Wipe the area dry with a paper towel and dispose of the towel in the plastic disposal bag in the spill kit.
14. Place all contaminated items into the plastic disposal bag. Remove your gloves last and drop them into the bag. Seal the bag and mark it with "Mercury Contaminated Waste" tags from the kit.

### Indoor Spills:

1. For spills onto carpet or inside any customer premises, immediately notify your supervisor who will notify Environmental Services at ext 2442, ext 2654, or ext 3359. Mercury will penetrate the carpet backing, so begin clean up as soon as possible.
2. **NEVER** use a regular vacuum cleaner to collect mercury!!
3. Pick up as much mercury as possible with the hand pump or scoop and scraper, and return it to the collection container.
4. Use the Hg absorb powder on a hidden area to test color fastness. If it is OK, proceed with normal cleaning procedures. If not, wait for Environmental Affairs to call a qualified contractor.
5. All clean mercury may be placed in the SET clean mercury storage containers at any facility. Dispose of contaminated mercury plastic disposal bags in the contaminated mercury storage container at any facility.

### H. Disposal

1. You may empty mercury from your individual collection containers only into the approved, properly labeled mercury storage container at any location.
2. Each location will designate a person to monitor the levels of waste mercury. This person will notify SET Environmental at (847) 537-9221 when the storage containers near their full mark, or the 180-day time limit, which will be marked on the storage container when it is delivered.
3. Nicor Gas employees will not transport SET Environmental storage containers with their vehicles. Only mercury-containing equipment and the approved collection container may be transported in Nicor Gas company vehicles.
4. You will no longer deliver mercury or equipment that contained mercury to the LaGrange Meter Shop for disposal. Each location is responsible for their own mercury disposal.

### I. Training

If your job duties do or *may* include handling mercury, you will be trained in the Nicor Gas mercury handling procedures before you handle mercury or equipment that contains mercury. Training occurs as outlined below:

1. Training is provided for new employees whose jobs may require them to handle mercury, and whenever procedures change.

2. Training consists of the following:
  - a. Your duties when handling mercury, as outlined in the Mercury Program
  - b. Where mercury occurs in our system
  - c. Spill prevention and proper use of all components of the spill kit
  - d. Environmental and personal exposure issues associated with mercury
  - e. Mercury collection, disposal and storage
  - f. Notifications to be made in case of a spill
3. Retraining will be accomplished every year through a tailgate session or by other means.

**Northern Illinois Gas  
Safety Department  
Mercury Handling Lesson Plan  
Course Code: TT 0399**

Content Outline	Training Aids	References	Activity
<b>A. Introduction</b>			
Introduce yourself to the class .			
Complete necessary paperwork.			
Explain course objectives and sequence.			
<b>B. Pre-Test</b>			
Administer the pre-test, review and score.			Class participation
<b>C. Mercury (Hg): What, Where and Why?</b>			
Where: A naturally occurring substance found in the earth's crust.			
What: The only metallic substance that is liquid at ordinary temperatures.	Mercury in a pan or bottle		Show how Hg flows
Weights 13.5 times that of water			
One of the most rare metals known. Naturally occurs a total of 1/2 gram per ton of rock.			
Uses: Used in heat control devices, thermostats			
Felt manufacturing, dental fillings, mirrors, antiseptics and insecticides.			Mercury poisoning was responsible for the "mad hatter"... it was used in manufacturing felt.



Content Outline	Training Aids	References	Activity
<b>F. Mercury (Hg) Regulator Removal</b>			
All regulator removals are different. Your main objective is to prevent exposure.			
Shut the gas off and relieve line pack pressure by breaking a union downstream of the regulator.	Meter/Reg set		Demonstrate the procedure.
Keep the regulator upright at all times. Mishandling can cause mercury to flow into the body of the regulator. If you cannot keep it upright, the Hg must be removed in place.	Cut-Away reg.		Show how the mercury can move throughout the regulator if it is mishandled.
Tap the reg. with a wrench to dislodge any Hg.	Cut-Away		Tap on top of regulator.
Tap the top of the container.	Container		Tap on top of collection container
Loosen the top of the container and place into the spill pan. Place the pan under the regulator.	Container and 9x9 spill pan		Loosen the top, set into spill pan.
Break the mercury cup loose and slowly remove.	Reg and cup		Demonstrate
Remove the container top and pour all visible Hg into the collection container in the spill pan.	Container, cup		Demonstrate
Cap the container tightly, and replace the cup onto the regulator.			Demonstrate
Remove the regulator, looking for any mercury. If there is ANY visible mercury, the regulator cannot be placed into the dumpster. It must be placed into the contaminated mercury pail at your facility.	Regulator		Demonstrate, show where you would normally find mercury; any opening and its threads.
Place all components onto your vehicle OUTSIDE the passenger compartment.			
<b>IF THE REGULATOR WILL REMAIN UPRIGHT</b>			

Content Outline	Training Aids	References	Activity
Shut the gas off and remove all line pressure by breaking a union downstream of the regulator.	Reg, container, spill pan, vise		Demonstrate all steps.
Follow all practices for removing a regulator, keeping the regulator upright at all times.			
Do Not use a hacksaw to cut the regulator loose. Use a 4-wheel cutter if you cannot break fittings.			
Take the regulator to your truck and place it into the vise.			
Place the spill pan under the regulator, tap and loosen the cap on the collection container.			
Loosen the Hg cup and remove slowly.			
Pour all visible Hg into the container and replace the cap. Check the cup for residual mercury.			
Check the opening the cup came from for visible mercury. If there is none, replace the cup.			
If mercury is visible, replace the cup and identify the regulator as being contaminated.			
Replace all articles on your vehicle and be sure they are secure and cannot fall out.			
<b>WHEN YOU RETURN TO YOUR FACILITY</b>			
Pour all clean mercury into the flask provided.			



Content Outline	Training Aids	References	Activity
Place any contaminated articles (spill kit items, regs) into the contaminated pail provided.			
<b>DO NOT PLACE ANY ITEMS WITH VISIBLE Hg INTO THE SCRAP DUMPSTER. IT MUST BE DISPOSED OF BY SET ENVIRONMENTAL</b>			
<b>G. Spill Response</b>			
All spills must be reported by your supervisor immediately. The supervisor will then immediately notify Environmental Affairs at x 2455.			
A spill of one pound of mercury must be reported to the EPA. One pound is equal to the contents of four mercury regulators, or one liquid ounce.	Shot glass		Spill one ounce of glycerin or other viscous liquid that will not flatten out to simulate a Hg spill.
Estimating the amount of your spill to dictate your supervisors response.			
A large spill will be cleaned by an industrial hygienist.			
<b>INDOOR SPILLS</b>			
Secure the area, keep the customer and any pets away.			
Prevent the Hg from flowing.			
Secure a Hg spill kit, and put on the glasses and gloves.	Spill Kit		Display items.
Scrape as much Hg into a puddle as you can, and push it into the scoop. Pour Hg into the container.	Scoop and scraper		Scrape substance into the scoop, and pour into the collection container.

Content Outline	Training Aids	References	Activity
Use the vacuum pump or aspirator to pick up beads still on the ground.	Hand pump, bulb aspirator		Vacuum puddle up.
Pour the remaining Hg into a puddle and use pour Hg Absorb to pick up the puddle, and dispose of the spill in the disposal bag.	Hg absorb, water bottle, scoop and scraper, disposal bag.		Pour Hg absorb around the puddle, then over the top. Add a little water and wait a few minutes. Scrape the puddle into the scraper, place into the plastic bag.
When all mercury has been picked up, place all contaminated items into the disposal bag.	Spill kit contents		Demonstrate
Use a paper towel to wipe up, and place it into the bag.	Paper towel, bag		Demonstrate
Put your gloves in last, and seal the bag.	Gloves.		Demonstrate
Place the contaminated sticker on the bag.	Sticker, bag		Demonstrate
<b>OUTDOOR SPILLS</b>			
Mercury spilled outdoors must be cleaned using the spill kit.			
If spilled onto soil, scoop up the soil and mercury and place it into the disposal bag or seamless pail.	Shovel, bag, pail		Demonstrate
<b>H. Disposal</b>			
Each reporting facility will possess one five-gallon plastic pail containing a metal flask for clean Hg.	Flask and pail		Display the items.

